

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
STATESBORO DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CASE NO.: 6:21CR00006-1
)	
CREG ANTONIO PAGE,)	
)	
DEFENDANT.)	

DEFENDANT CREG ANTONIO PAGE’S
SENTENCING MEMORANDUM

Creg Antonio Page was arrested on December 17, 2020 and has remained in jail since that date. As of May 3, 2022, he has been incarcerated five hundred (500) consecutive days. (*Doc. 217*)

After being charged in eight counts in the indictment, Mr. Page pled guilty to distribution of 1 gram of heroin for \$200.00. (*Doc. 127*)

Mr. Page’s criminal history category is I, the lowest possible.

Mr. Page’s total offense level increased by two levels because he possessed a “dangerous weapon.” (*Doc. 217*) For clarification, the “dangerous weapon” that resulted in a two-level enhancement to the offense level was a rifle-style BB gun owned by Mr. Page’s son. The sentencing guidelines include “BB gun” in the definition of “dangerous weapon.” USSG § 2D1.1(b)(1)

Mr. Page is 45 years old. He was previously married and divorced, and is currently single. He has thirteen minor children and three adult children. Born in Vidalia, Mr. Page spent about fifteen years in Atlanta until he returned to live in the Southern District of Georgia. Primarily raised by his single mother, Mr. Page rarely saw his father, a violent man with a criminal history of his own. In spite of his struggles, Mr. Page had no juvenile adjudications.

Mr. Page has been shot three times, once in 2012 and twice in 2019. (*Doc. 217*) He suffers ongoing leg pain from one of the wounds. He also suffers from depression, hypertension, and osteomyelitis. (*Doc. 217*) Mr. Page is prescribed Simvastatin, 40 milligrams; Mobic, 15 milligrams; hydrochlorothiazide, 25 milligrams; Keppra, 1000 milligrams; Lisinopril, 20 milligrams; Omeprazole, 20 milligrams; and Paroxetine, 20 milligrams. (*Doc. 217*) In the past, Mr. Page was treated for PTSD and major depressive disorder. (*Doc. 217*) While incarcerated, he fell out of his bunk and fractured his jaw. After days of suffering intractable pain and eating his meals through a straw, jail personnel finally provided him with appropriate medical care, and doctors performed surgery to repair the injury.

At the time of his arrest, Mr. Page was a daily user of marihuana, Ecstasy, and Percocet. (*Doc. 217*) He consumed about one-fifth of alcohol per day three times per week. (*Doc. 217*)

Mr. Page has a negative net worth and is unemployed. He wants to earn a GED.

Mr. Page accepted responsibility and is entitled to 3-level reduction.

ARGUMENT AND CITATION OF AUTHORITY

It is the duty of every sentencing judge to evaluate each person as a unique individual, recognizing that he may not fit neatly within the confining rubric of a formulaic sentencing table. Gall v. United States, 128 S.Ct. 586 (2007) (citing Koon v. United States, 518 U.S. 81 (1996)). The court must consider the factors listed in 18 U.S.C. § 3553(a). The court should tailor an individualized “sentence that is sufficient but not greater than necessary to comply with the purposes of § 3553(a),” which include the following, to wit:

- (1) the nature and circumstances of the offense and the history and characteristics of the defendant;
- (2) the need for the sentence imposed—
 - (A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense;
 - (B) to afford adequate deterrence to criminal conduct;
 - (C) to protect the public from further crimes of the defendant; and
 - (D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner.

18 U.S.C. § 3553(a).

The nature and circumstances of the offense are simple. Mr. Page sold a confidential informant 1 gram of heroin for \$200.00. He knows that was wrong. He admitted he did it. He accepted responsibility without any excuse.

Mr. Page's characteristics are straight forward. He is a 45 year old man with some education, in fair physical health, some mental and emotional issues, with ongoing pain from a gunshot wound and a fractured jaw. He desperately needs drug and alcohol treatment. He has produced quite a number of illegitimate children, but he supports all of them as needed, and he tries to have a meaningful relationship with all of them. While he has been arrested a number of times, most of the cases were dismissed.

Regarding the § 3553(a)(2) factors, Mr. Page does not object to the probation office's calculation of the guideline imprisonment range of 57 months to 71 months and respectfully requests that the Court impose a sentence at the low end of the range and that the sentence include all drug and alcohol treatment services available to him, as well as the means to earn his GED. Mr. Page requests that he receive credit for the time he has been incarcerated since his arrest on December 20, 2020. Finally, he requests that the Court recommend that he be housed at Estill, South Carolina.

Respectfully submitted this 29th day of April, 2022.

(Signature on next page)

(Signature continued from preceding page of Defendant Creg Antonio Page's Sentencing Memorandum)

s/ Troy W. Marsh, Jr., Esq.

Attorney Bar Number 471440

Attorney for Creg Antonio Page

The Marsh Law Firm

34 Courtland Street

Statesboro, Georgia 30458

Telephone: (912) 764-7388

E-Mail: troy@troymarshlaw.com

CERTIFICATE OF SERVICE

This is to certify that I have on this date served a copy of the foregoing
DEFENDANT CREG ANTONIO PAGE’S SENTENCING MEMORANDUM
upon all counsel of record in accordance with the directives from the Court Notice
of Electronic Filing (“NEF”) which was generated as a result of electronic filing.

Respectfully submitted this 29 day of April, 2022.

s/ Troy W. Marsh, Jr., Esq.
Attorney Bar Number: 471440
Attorney for Creg Antonio Page
The Marsh Law Firm
34 Courtland Street
Statesboro, Georgia 30458
Telephone: (912) 764-7388
E-mail: troy@troymarshlaw.com